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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR-07-0599 SBA
)	
Plaintiff,)	JOINT MOTION TO SET STATUS
)	HEARING DATE ON OCTOBER 7, 2008
v.)	AND TO EXCLUDE TIME UNDER THE
)	SPEEDY TRIAL ACT
DARREN BROWN,)	
)	
Defendant.)	Date: October 7, 2008
)	Time: 9:00 a.m.
)	Court: Hon. Sandra B. Armstrong

The parties jointly request that this Court vacate the status hearing set for September 16, 2008, set a new status hearing in this matter on October 7, 2008 at 9:00 a.m., and exclude time under the Speedy Trial Act between September 16, 2008 and October 7, 2008.

On September 2, 2008, at the status hearing in the above-captioned matter, the Court set the next status hearing for September 16, 2008, as defense counsel requested certain discovery from the Government. The Court also excluded time, pursuant to the Speedy Trial Act, between September 2, 2008 and September 16, 2008 to allow for the effective preparation of counsel, as defense counsel needed time to review the additional discovery. The Government has since produced additional discovery to defense counsel, but defense counsel needs additional time to

1 review the discovery, discuss the discovery with the defendant, and determine whether there are
2 any motions to file.

3 The parties hereby jointly request that the Court vacate the status hearing set for
4 September 16, 2008 and reschedule the status hearing for October 7, 2008. The parties further
5 jointly request that the Court exclude time between September 16, 2008 and October 7, 2008
6 under the Speedy Trial Act for the reasons stated above and pursuant to 18 U.S.C. §
7 3161(h)(8)(B)(iv). The parties agree the ends of justice served by granting the request outweigh
8 the best interests of the public and the defendant in a speedy trial.

9
10 DATED: September 12, 2008

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12
13 /s/
CHRISTINE Y. WONG
Assistant United States Attorney
14 Counsel for United States

/s/
JOYCE LEAVITT
Counsel for Darren Brown

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

11	UNITED STATES OF AMERICA,)	No. CR-07-599 SBA
12	Plaintiff,)	
13	v.)	[PROPOSED] ORDER GRANTING JOINT
14	DARREN BROWN,)	MOTION TO SET STATUS HEARING
15	Defendant.)	DATE ON OCTOBER 7, 2008 AND TO
16)	EXCLUDE TIME UNDER THE SPEEDY
17)	TRIAL ACT
18)	
19)	Date: October 7, 2008
20)	Time: 9:00 a.m.
21)	Court: Hon. Sandra B. Armstrong
22)	

23 The parties jointly requested that a status hearing in this matter be set on October 7, 2008,
24 and that time continue to be excluded under the Speedy Trial Act between September 16, 2008
25 and October 7, 2008 to allow for the effective preparation of counsel for the reasons set forth in
26 the parties' joint request. For these stated reasons, the Court finds that the ends of justice served
27 by granting the request outweigh the best interests of the public and the defendant in a speedy
28 trial. Good cause appearing therefor, and pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv),

IT IS HEREBY ORDERED that the status hearing in this matter is set for October 7,
2008 at 9:00 a.m., and that time between September 16, 2008 and October 7, 2008 is excluded

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1 under the Speedy Trial Act to allow for the effective preparation of counsel, taking into account
2 the exercise of due diligence.

3
4 DATED: _____

HON. SAUNDRA BROWN ARMSTRONG
United States District Judge